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| 1 | Dismiss. |
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| 2 | 3. Counsel's firm has made extensive efforts to reach clients listed as Exhibit A, |
| 3 | subject to Defendants' Motion to Dismiss. |
| 4 | 4. Those efforts include extensive phone calls, text messages, emails, physical |
| 5 | mailings to last known address, and additional address searches in databases. Counsel has also |
| 6 | employed a private investigator to help locate these individuals. Through the database searches |
| 7 | and private investigators, Counsel also attempted to reach potential relatives in an effort to reach |
| 8 | the Plaintiffs. |
| 9 | I declare under penalty of perjury that the foregoing is true and correct, and that this |
| 10 | declaration was executed on October 10, 2025, in Sacramento, California. |
| 11 | |
| 12 | Dated: October 10, 2025 CUTTER LAW P.C. |
| 13 | |
| 14 | By:/s/ Jennifer S. Domer |
| 15 | Jennifer S. Domer |
| 16 | Attorney for Roe CL Plaintiffs |
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| | -2- JENNIFER S. DOMER'S DECLARATION IN SUPPORT OF OPPOSITION TO MOTION TO DISMISS |

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